

# ARP ESSER Recommendations for Meaningful Engagement with Stakeholders and Public Comment

## Purpose and Background

The purpose of this document is to provide LEAs with recommendations and best practices for meaningful engagement and consultation with stakeholders during the development of their ARP ESSER LEA Plan. The U.S. Department of Education, under the Interim Final Requirements (IFR) of April 22, 2021, requires that LEAs engage with a specified list of stakeholders and solicit public comment on how the LEA plans to use its ARP ESSER funds.

This requirement was not accompanied by specific guidance on how this engagement must be carried out. This document aims to support LEAs in this process. The Agency of Education (AOE) is committed to honoring the engagement that may have already taken place during the Education Recovery planning process and over the past several months, as long as that engagement can be tied to investments in the LEA's ARP ESSER plan.

To support this outreach and engagement process, the Agency has developed an *optional* [ARP ESSER LEA Plan template](#) that contains all of the required elements from the IFR and optional or recommended sections based on feedback received from LEAs that will facilitate communication with the public and stakeholders.

Evidence of engagement and solicitation of public comment will be a required element of the ARP ESSER Phase II application in the Grants Management System (GMS), so it is important that LEAs document their efforts and how the input they have received has informed their plans for ARP ESSER funds.

## Interim Final Requirements

The IFR defines a specific set of sections that must be present in the ARP ESSER LEA Plan (these are all present in the [Template document](#)) and identifies the list of stakeholder groups that must be engaged, in addition to seeking public comment.

It is important to identify that stakeholder engagement and public comment and input are two separate processes that may or may not overlap. Both processes must be documented.

- [Why is stakeholder engagement important and required?](#)
- [Why is there a required list of stakeholders?](#)
- [ARP ESSER LEA Plan](#)
  - i. [COVID-19 Prevention and Mitigation Strategies](#)
  - ii. [20% Reserve to Address the Academic Impact of Lost Instructional Time](#)
    1. Evidence-Based Strategies to Address the Academic Impact of Lost Instruction Time

## Contact Information:

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- iii. [Plan for Remaining 80% of ARP ESSER Funds](#)
- iv. [How the LEA will ensure that the interventions it implements address impacts to those students disproportionately impacted by the COVID-19 pandemic](#)
  - v. [Plan for Meaningful Consultation and Stakeholder Engagement](#) and [Public Comment](#)
- b. [Accessible](#)

## Basic Principles and Foundations

In recognition that there is a dearth of federal guidance on how engagement for ARP ESSER should be carried out, the AOE has tried to define some basic principles and foundational practices.

One source of support is the [Meaningful Local Engagement Under ESSA: A Handbook for LEA and School Leaders](#) created by the Council of Chief State School Officers. The handbook asks “What Do We Mean By “Stakeholder Engagement”?” and outlines these basic principles:

- *In the context of education policy and decision-making, stakeholders are community members who are involved and invested in districts, schools, programs, and outcomes for students. Stakeholders include students, families, educators, leaders, and the many partners who support them.*
- *Engagement is the process of communicating to, learning from, and partnering with stakeholders that acknowledges the unique needs and strengths of the stakeholders involved.*
- *We believe that stakeholder engagement should be meaningful: it should be inclusive, clear, effective and ongoing in order to best support educational equity and excellence.*

The Agency would add to this list that it is important to recognize that engagement with stakeholders that involves complex interactions between multiple funding sources may require some additional communication and information sharing. For example, an LEA might wish to share its long term funding strategy for staffing for student supports so that families or other stakeholders understand why ARP ESSER funds, with their limited period of performance, might not be the appropriate funding strategy. The LEA should ask itself, what do stakeholders need to understand about our school or district finance system in order to meaningfully engage with the ARP ESSER LEA plan?

## Common Questions and Recommendations

Question: How an LEA can be sure it has reached out to the group of stakeholders?

Recommendation: This is understandably difficult. LEAs can document reasonable outreach including placing information on its website, sending direct communications to those that have requested information, and advertising in a Vermont newspaper of record as established by the VT Secretary of State.

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Question: How an LEA can resolve conflicts during the meaningful consultation process? For example, what if differing groups of stakeholders have different ideas for the funds?

Recommendation: Engagement is the process of communicating to, learning from, and partnering with stakeholders and the LEA must consider all input from groups. Ultimately, the LEA, as the federal subrecipient of the funds and signatory to the required assurances, has the final authority on how the funds are used. The Agency reminds LEAs of the importance of keeping documentation of all input and all decisions.

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Question: What role or authority does the local school board have in determining the use of ARP ESSER funds (or any COVID-19 federal emergency funding)?

Recommendation: When it comes to the role of the school board, The SU/SD should abide by its local delegation practices. For instance, many SU/SD boards annually delegate the duties of administering all federal funds to the superintendent and the Agency of Education requires the superintendent of each SU/SD to make specific assurances relating to the use of these funds. Based on local delegation practices, any SU/SD board that does participate in administering ARP ESSER funds should be mindful of these assurances and the role of the superintendent as the individual accountable for administering them.

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Question: We advertised a webinar/meeting and no one came. What does this mean for our stakeholder engagement?

Recommendation: The US Department of Education has indicated that if an LEA can document this outreach as part of its “due diligence,” then it will count as part of their engagement efforts. The Agency encourages LEAs to seek multiple avenues for outreach and bear in mind that webinars might not reach families without access to internet. To encourage maximum engagement, LEAs should offer multiple options for input such as scheduling engagement meetings at different times of the day and different methods such as email, mailing address, web comments, etc. to allow for maximum input. LEAs might also consider offering childcare services (an ESSER allowable cost) to increase the number of families that could attend.

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Question: How can we ensure that we have fully sought out engagement from all stakeholder populations in our LEA, especially those that represent underserved and historically marginalized student groups?

Recommendation: There are many ways that an LEA can conduct meaningful outreach and one helpful resource is the [Equitable Community Engagement Toolkit](#) from the Great Schools Partnership. The [AOE website](#) also contains a list of tools for community, family and student engagement. In addition, LEAs are encouraged to use their district liaisons and coordinators (e.g. EL Coordinators and EL Family Liaisons, Migrant Education Coordinators and Homeless Liaisons) to ensure that these families have access to ARP ESSER LEA plans and an opportunity to voice their concerns or provide input.

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Questions regarding meaningful stakeholder engagement for ARP ESSER should be directed to Josh Souliere ([josh.souliere@vermont.gov](mailto:josh.souliere@vermont.gov)).

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